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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
CHAIRMAN

JIM IRVIN
COMMISSIONER

MARC SPITZER
COMMISSIONER

Arizona Corporation Commission

DOCKETED

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IN THE MATTER OF INVESTIGATION OF
THE COST OF TELECOMMUNICATIONS
ACCESS

Docket No. T-00000D-00-0672

**WORLD COM, INC.'S RESPONSE TO
CITIZENS' MOTION TO CONSOLIDATE AND
MOTION FOR RECONSIDERATION**

WorldCom, Inc., on behalf of its Arizona operating affiliates ("WorldCom"), joins in the Arizona Corporation Commission Staff's opposition to Citizens' motion to consolidate. While WorldCom concurs with the Staff's opposition to consolidation, WorldCom urges the Administrative Law Judge to reconsider the indefinite suspension of the access case. WorldCom requests that the access case be suspended for 90 days and then revisited at that time for the reasons set forth in WorldCom's July 8, 2002 Response to Staff's Motion to Suspend Procedural Schedule. A copy of WorldCom's July 8, 2002 Response is attached. Finally, WorldCom notes

1 that despite being on the service list in this case, it did not receive a copy of Citizens' motion to
2 consolidate and requests that it receive such filings in the future.

3
4 Respectfully submitted this 20th day of August, 2002.

5 LEWIS AND ROCA LLP

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9 Phoenix, Arizona 85004
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17 Attorneys for WorldCom, Inc.

18 ORIGINAL AND ten (10) copies
19 of the foregoing hand-delivered
20 this 20th day of August, 2002, to:

21 Arizona Corporation Commission
22 Utilities Division – Docket Control
23 1200 W. Washington Street
24 Phoenix, Arizona 85007

25 COPY of the foregoing hand-delivered
26 this 20th day of August, 2002,
to:

21 Lyn Farmer, Esq.
22 Chief ALJ, Hearing Division
23 Arizona Corporation Commission
24 1200 West Washington
25 Phoenix, Arizona 85007

26 Christopher Kempley, Esq.
Chief Counsel, Legal Division
Arizona Corporation Commission
1200 West Washington Street
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Betty J. Griffin

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MARC SPITZER
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IN THE MATTER OF INVESTIGATION OF
THE COST OF TELECOMMUNICATIONS
ACCESS

Docket No. T-00000D-00-0672

RESPONSE TO COMMISSION
STAFF MOTION TO SUSPEND

WorldCom, Inc., on behalf of its operating affiliates ("WorldCom"), appreciates the Staff's desire for an extension of this access charge proceeding due to the other telecommunications proceedings now pending before the Arizona Corporation Commission (the "Commission"). However, WorldCom respectfully requests that the suspension not be indefinite but rather for ninety days. If, prior to the end of this ninety day extension, other proceedings are still requiring significant Staff resources, the Staff can request an additional extension. On the other hand, some of the pending telecommunications proceedings may have been concluded by that time or, at least, the hearing division will be in a better position to evaluate the status of those

1 proceedings. WorldCom respectfully requests that the Staff's motion for an extension be granted,
2 but only for ninety days.

3
4 Respectfully submitted this 8th day of July, 2002.

5 LEWIS AND ROCA LLP

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- 4 Ernest Johnson
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